

U.S.C. § 103(a) as being unpatentable over *Sasson et al.* and *Wakui* and further in view of *Watanabe* (USP 4,887,161). Applicant respectfully traverses these rejections.

Claim Rejections - 35 U.S.C. § 103 - *Sasson et al./Wakui*

With regard to the Examiner's rejection of claim 6, the Examiner admits that *Sasson et al.* does not teach or disclose automatically transferring the image data from the built-in memory to the detachable memory card upon the detecting means detecting insertion. The Examiner relies on *Wakui* to cure the deficiencies of the teachings of *Sasson et al.*, asserting *Wakui* teaches this feature at col. 10, ll. 32-64. Applicant respectfully disagrees with the Examiner's characterization of this reference.

It is respectfully submitted that *Wakui* discloses a still video camera including detachably attachable external memory. Specifically, *Wakui* teaches at col. 10, ll. 26-41 as follows:

3) "Recording of Data in the IC Memory Card 31"

When the record mode setting command signal is input to the system controller 2 in accordance with the operation of the mode selection switch by an operator, the record mode is set by the system controller 2.

If the terminal of the IC memory card 31 is correctly connected to the terminal of the connector 18, and the remaining storage capacity of the IC memory card 31 is sufficient for the image data of one image, the memory card record mode is set by the system controller 2.

If the release switch is turned ON in the memory card record mode, the exposure operation is carried out for the CCD 3 under predetermined exposure conditions, similar to the recording operation of data in the image flash memory 20 mentioned above.

In contrast, the present invention as set forth in claim 6 recites, *inter alia*, a digital camera for capturing images comprising memory control means for automatically

transferring the image data from the built-in memory to the detachable memory card upon the detecting means detecting the insertion. It is respectfully submitted that the invention set forth in *Wakui* discloses storing data on IC memory card 31 when the record mode setting command signal is input to the system controller 2 in accordance with the operation of a mode selection switch. Thus, when an exposure operation is carried out, the data is stored in IC memory card 31. It is respectfully submitted that *Wakui* does not teach or suggest automatically transferring image data from the built-in memory to the detachable memory card upon detecting an insertion of a memory card. As such, *Wakui* fails to cure the deficiencies of the teachings of *Sasson et al.*, assuming these references are combinable, which Applicant does not admit. Thus, it is respectfully submitted that claim 6 is not obvious over *Sasson et al.* in view of *Wakui* and it is requested that the outstanding rejection be withdrawn.

It is respectfully submitted that dependent claims 7-13 are allowable for the reasons set forth above with regard to claim 6 at least based upon their dependency on claim 6.

It is further respectfully submitted that claims 14-15 contain elements similar to those discussed above with regard to claim 6 and, thus, claims 14-15 are allowable at least for the reasons set forth above with regard to claim 6.

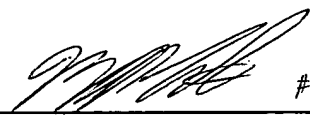
CONCLUSION

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Catherine M. Voisin (Reg. No. 52,327) at the telephone number of (703) 205-8000, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17; particularly, extension of time fees.

Respectfully submitted,

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